Marc S. Dreier (MD-9713) Joel A. Chernov (JC-8789) Regina M. Alter (RA-7014) DREIER LLP 499 Park Avenue New York, New York 10022 (212) 328-6100

Attorneys for Plaintiffs

SOUTHERN DISTRICT OF NEW YORK	
	X
	;
HWB VICTORIA STRATEGIES PORTFOLIO, et al.,	:

Plaintiffs,

07 CV 10657 (TPG)

NOTICE OF MOTION

-against-

THE REPUBLIC OF ARGENTINA,

IN HADDO OU FADO DIAMBIAM AVIIDA

Defendant.

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PLEASE TAKE NOTICE THAT upon the annexed declarations of plaintiff Gunther Braun, dated April 30, 2008, with annexed exhibits, Roby Haas, Chairman of the Supervisory Board of LRI Invest S.A., the managing company for plaintiff HWB Renten Portfolio Plus, dated April 30, 2008, with annexed exhibits, Roby Haas, Chairman of the Supervisory Board of LRI Invest S.A., the managing company for plaintiff HWB Quo Vadis, dated April 30, 2008, with annexed exhibits, Roby Haas, Chairman of the Supervisory Board of LRI Invest S.A., the managing company for plaintiff HWB Alexandra Strategies Portfolio, dated April 30, 2008, with annexed exhibits, Roby Haas, Chairman of the Supervisory Board of LRI Invest S.A., the managing company for plaintiff NW Global Strategy, dated April 30, 2008, with annexed exhibits, Roby Haas, Chairman of the Supervisory Board of LRI Invest S.A., the managing company for plaintiff HWB Victoria Strategies

Portfolio, dated April 30, 2008, with annexed exhibits, Roby Haas, Chairman of the Supervisory Board of LRI Invest S.A., the managing company for plaintiff HWB Portfolio Plus, dated April 30, 2008, with annexed exhibits, William Adriaanse, Director of Kheshia Holdings Ltd., the managing company for plaintiff Victoria Strategies Portfolio Ltd., dated April 23, 2008, with annexed exhibits, and Regina Alter, dated June 30, 2008, with annexed exhibits; the Statement of Material Facts Pursuant to Local Rule 56.1; the accompanying Memorandum of Law; and the pleadings and all prior proceedings had herein, the undersigned will move this Court before the Honorable Thomas P. Griesa, United States District Judge, at the United States Courthouse, 500 Pearl Street, New York, New York, at such time as the Court directs, for an Order, pursuant to Rule 56 of the Federal Rules of Civil Procedure, granting plaintiffs summary judgment as against defendant the Republic of Argentina, to strike defendant's discovery requests and for such other relief as the Court deems just

Dated: New York, New York June 30, 2008

and proper.

DREIER LLP

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